

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

DAVID LANE JOHNSON,

Plaintiff,

v.

NATIONAL FOOTBALL LEAGUE
PLAYERS ASSOCIATION *et al.*,

Defendants.

Case No. 5:17-cv-00047
Judge Sara Lioi

**MOTION FOR PERMISSION TO PROVIDE
SUPPLEMENTAL AUTHORITY**

Defendants, the National Football League (“NFL”) and the National Football League Management Council (“NFLMC,” collectively with the NFL, the “NFL Defendants”) respectfully request permission to file a brief supplemental memorandum in support of the NFL Defendants’ Motion to Dismiss (ECF No. 22).

Following the NFL Defendants’ filing of their Motion to Dismiss, the United States Supreme Court decided *Bristol-Myers Squibb Co. v. Superior Court of California*. 582 U.S. ____ (2017). That case is directly relevant to the jurisdictional arguments in the NFL’s Motion to Dismiss and controlling in this case. Accordingly, in light of this Court’s Order (ECF No. 51) staying the filing of all supplemental documents, the NFL Defendants respectfully

request that they may be permitted to inform this Court of new controlling authority and the impact of such supplemental authority on their Motion to Dismiss.

Dated: June 26, 2017

/s/ Philip M. Oliss

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing NFL Defendants' Supplemental Brief in Further Support of Their Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue, or, in the alternative, to Transfer Venue was electronically filed on June 26, 2017. Notice of this filing will be sent to all Parties by operation of the Court's electronic filing system. The Parties may access this filing through the Court's system.

/s/ Philip M. Oliss

Attorney for the Defendants National Football
League and National Football Management Council